



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Clean Air Act Full Compliance Evaluation Inspection Report

Marky's Autobody LLC
Twin Falls, ID 83301

Inspection Date: July 19, 2022

Report Author Signature

Date

Bryan Lange
U.S. Environmental Protection Agency, Contract Inspector
Eastern Research Group

Peer Review Signature

Date

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EPA Region 10

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Date

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Attachments

Attachment 1	Idaho Air Quality Compliance Inspection, Preliminary Inspection Findings
Attachment 2	EPA Region 10 Digital Image Log

1. Basic Facility and Inspection Information

Facility: Marky's Autobody LLC
406 Kimberly Road
Twin Falls, ID 83301

AFS/FRS Number: Not available

State Facility ID: 083-00147

SIC: 7532 Top, Body, and Upholstery Repair Shops and Paint Shops

NAICS: 811121 Automotive Body, Paint, Interior Repair and Maintenance

Permit Number: Idaho Permit to construct exemption concurrence, dated August 29, 2019

Facility Contacts: Mike Nelson
Paint Shop Manager
Marky's Autobody LLC
(208) 734-1869

Mark Gardoski
Supertow Owner
Marky's Autobody LLC
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Date of Inspection: July 19, 2022

Inspection Start/End Times: July 19, 2022, 11:30 am – 12:20 pm MST

Inspection Notice: This was an announced inspection.

Ms. Orr notified Mr. Nelson, by phone on July 18, 2022.

This was a Clean Air Act (CAA) compliance inspection by an Environmental Protection Agency (EPA) contractor. Inspector Mr. Lange, with Eastern Research Group, led the inspection. The state air agency was made aware of the inspection beforehand and participated in the inspection. The purpose was to identify potential compliance concerns with CAA regulations, specifically to gather information to determine if the facility is in compliance with permit exemption and the NESHAP subpart HHHHHH (Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources).

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

1. Facility/Process Description:

The following facility description is based on information provided by a facility representative in the opening conference as well as information found on-file regarding permits and prior inspections.

Marky's Autobody LLC is a refinishing operation that repairs and paints automobiles. It has a single semi-down draft paint booth. The facility does not paint complete cars, but repairs panels damaged in a collision. Mr. Nelson estimated a maximum daily repair volume at 5 panels. The emission sources located at the facility included the following:

- Mixing room,
- Spray booth,
- Spray guns,
- Spray gun cleaning equipment,
- Paint storage area, and
- Spray booth heater.

2. Compliance History

May 24, 2019, Idaho Department of Environmental Quality (DEQ) conducted an on-site inspection and the facility was found in compliance at the time of the inspection.

Marky's Autobody LLC is not registered in EPA's ECHO as of the date of this report.¹

¹ See <https://echo.epa.gov/>

3. Records Review Prior To The Inspection

Prior to inspection, Idaho DEQ shared copies of these items and each was reviewed:

- May 14, 2019 - Automotive coating self-exemption acknowledgement request. Idaho DEQ permit request forms blanks were populated and signed by Mr. Gardoski.
- May 14, 2019 - Example petition of exemption for the subpart HHHHHH NESHP. The petition forms blanks were populated and signed by Mr. Gardoski.
- May 24, 2019 - Idaho report documenting an on-site inspection.
- August 29, 2019- Permit to construct exemption concurrence.

a. Entry and Opening Conference

Mr. Lange and Ms. Orr ("the inspectors") arrived at the facility at approximately 11:30 am MST on July 19, 2022. They entered the customer lobby and met with Mr. Nelson. The inspectors presented identification cards and explained that they were at the facility to conduct a CAA permit inspection. The inspectors explained that the inspection would consist first, of a review of the permit exemption conditions and second a walk-through where records related to permit exemption will be reviewed.

The inspectors explained that after the walk-through, they will leave a carbon copy of an Idaho DEQ Air Quality Compliance Inspection Preliminary Inspection Findings Form (PIFF) documenting the inspection details and Ms. Orr will keep the original.

Mr. Nelson explained that at this time, the tow business and paint shop are linked on a corporate level, but a separate tax ID for the paint shop has been requested. Mr. Nelson expressed an interest in growing his paint business.

4. Facility Walk-Through and On-Site Records Review

At approximately 11:50 am MST, the inspectors were escorted into the automobile paint and repair area by Mr. Nelson.

To maintain the Idaho Department of Environmental Quality (DEQ) permit exemption the facilities coating material use rates shall not exceed 1.0 gallons per day for all coating materials. While at the paint mixing rack computer, the inspectors reviewed the daily coating use records. Specifically, Mr. Nelson provided paint consumption totals for three random dates chosen by the inspectors. The Mr. Nelson commented that paint was not mixed every day.

	7/13/2022	4/14/2022	9/15/2021
Total daily paint consumption (gallons)	0.8	0.4	0.95

Mr. Nelson explained that the facility does not use methylene chloride (MeCl) or abrasive blasting to remove paint. The inspectors observed the dozens of BASF paints in the storage area. Ms. Orr selected a paint at random and Mr. Nelson produced the SDS sheet. Neither silicon dioxide nor the Subpart HHHHHH target HAP (i.e., compounds of chromium, lead, manganese, nickel, or cadmium) were present in a measurable quantity.

The inspectors observed dozens of paints in the mixing area. See photographs 1 and 2 in attached photo log.

The inspectors observed that each paint gun used for the applications of coatings was HVLP. See photograph 3 through 5.

The permit exemption requires that the combined heat input of all paint booth heaters be less than 3.30 MMBtu/hr. The single paint booth is equipped with a 1.5 MMBtu/hr natural gas fired heater which is used in the 20-minute bake cycle. The facility does not have separate curing oven. Mr. Nelson expects delivery of an additional paint booth heater before winter. The heat input capacity of the new heater was not discussed, but Mr. Nelson is aware of his operational heat input limit.

Mr. Nelson explained the paint booth filter replacement procedures. There is an inlet air filter that is changed monthly, booth ceiling filters are changed every six months, and exhaust filters are changed weekly. Consistent flow is necessary for a quality finish on the automobiles.

The walk-through ended at approximately 12:15 pm MST.

5. Closing Conference

At approximately 12:25 pm MST, the inspectors held a closing conference. Mr. Lange led the closing conference and summarized the exemption permit conditions and records the inspectors had reviewed. Mr. Lange went through his inspection notes and explained that there were no areas of concern from the inspection.

Ms. Orr explained that the condition in the permit exemption concurrence letter are operational limit. If there is an expectation that coating material use will exceed the 1.0 gallons per day rate, then Ms. Orr suggested that a dialogue be opened with the DEQ permit staff. Ms. Orr also explained that if on-site operations change a resubmission of the Petition of Exemption NESHAP should be considered.

Ms. Orr presented Mr. Nelson with carbon copy of an Idaho DEQ Air Quality Compliance Inspection PIFF documenting inspection details and preliminary status of in-compliance determination at the time of the inspection. See attachment 1.

The inspectors departed the facility at 12:30 pm MST.

There are no post inspection activities related to the July 19, 2022, inspection.